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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 UNITED STATES SECURITIES AND
12 EXCHANGE COMMISSION,
13 Plaintiff,
14 vs.
15 MICHAEL B. ZIPPRICH,
16 AMERICA'S REHAB CAMPUSES, LLC,
17 AMERICA'S REHAB CAMPUSES –
18 ARIZONA, LLC,
19 and
20 ARIZONA REHAB CAMPUS, LLC,
21 Defendants.

Case No. 2:20-cv-02308-JCM-DJA

**STIPULATION AND ORDER
TO EXTEND TIME TO RESPOND TO
MOTION TO DISMISS FIRST AMENDED
COMPLAINT**

(First Request)

1 Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants
2 Michael B. Zipprich, America’s Rehab Campuses, LLC (“ARC”), America’s Rehab
3 Campuses-Arizona, LLC (“ARC-AZ”), and Arizona Rehab Campus, LLC (“ARC-OP”)
4 (collectively, the “Parties”), by and through their respective counsel of record, agree as follows:

5 1. The SEC seeks an order extending the time to respond to Defendants’ Motion to
6 Dismiss First Amended Complaint, filed on April 12, 2021. (ECF No. 13, “Motion to Dismiss”).

7 2. The deadline to respond to the Motion to Dismiss is April 26, 2021.

8 3. Counsel for the SEC requests an extension of 14 days to respond to the Motion to
9 Dismiss due to competing deadlines in other cases and investigations, including expert discovery in
10 another matter that is scheduled for completion by April 30, 2021.

11 4. This is the first request to extend the deadline to respond to the Motion to Dismiss.
12 The deadline to respond to the SEC’s First Amended Complaint was extended previously by 14
13 days upon stipulation of the parties. (ECF. No. 10).

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1 5. In light of the foregoing, the Parties STIPULATE AND AGREE, subject to this
2 Court's approval, that the time for the SEC to respond to the Motion to Dismiss shall be extended;
3 and the SEC shall respond to the Motion to Dismiss by or before May 10, 2021.

4
5 Dated this 21st day of April, 2021.

6 PISANELLI BICE PLLC

7 By: /s/ M. Magali Mercera

8 James J. Pisanelli, Esq., #4027
9 M. Magali Mercera, Esq., #11742
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12 WINSTON & STRAWN LLP
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19 200 Park Avenue
20 New York, NY 10166-4193

21 *Attorneys for Defendants*

22 Dated this 21st day of April, 2021.

23 SECURITIES AND EXCHANGE
24 COMMISSION

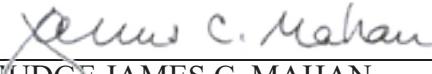
25 By: /s/Terry R. Miller

26 Terry R. Miller, Esq.
27 (admitted *pro hac vice*)
28 Securities and Exchange Commission
1961 Stout Street, Suite 1700
Denver, CO 80294

29 *Attorneys for Securities and Exchange
30 Commission*

31 **ORDER**

32 IT IS SO ORDERED that the SEC shall respond to Defendants' Motion to Dismiss (ECF No.
33 13) by or before May 10, 2021.

34 
35 JUDGE JAMES C. MAHAN
36 UNITED STATES DISTRICT JUDGE

37 DATED: April 23, 2021

38 CASE NO. 2:20-cv-02308-JCM-DJA